

**DIAGEO GLOBAL SUPPLY
RELAY PLANT
5001 WASHINGTON BLVD.
BALTIMORE, MARYLAND 21227
PART 70 OPERATING PERMIT FACT SHEET
PERMIT #24-005-0146**

BACKGROUND

The Diageo North America, Inc. (Diageo) facility, located in Relay, Baltimore County, blends and packages distilled spirits for consumer use. A variety of beverage materials are processed including grain neutral spirits, rums, and whiskeys. Materials are received by truck and rail and stored in tanks. Processing steps include filtration, blending with other ingredients, and cutting with demineralized water. Finished product streams are dispensed into bottles and packed in cartons for distribution in commerce. Some products are shipped in bulk form to other sites using barrels, totes, railcars, and tank trucks. Most processing activities occur inside one of several buildings. The facility has limited aging operations. Outside activities include temporary storage of empty oak barrels used in aging and several larger product storage tanks.

Diageo Global Supply has operated the Relay plant since December 21, 2001. The previous owner was Seagram Americas. The primary SIC code for this facility is 2085.

The following table summarizes the actual emissions from Diageo's Relay facility based on its Annual Emission Certification Reports:

Table 1: Actual Emissions

Year	NO _x (TPY)	SO _x (TPY)	PM ₁₀ (TPY)	CO (TPY)	VOC (TPY)	Total HAP (TPY)
2011	2.4	0.01	0.1	2.0	331	0
2010	3.2	0.02	0.1	2.6	362	0
2009	3.0	0.02	0.1	2.4	375	0
2008	2.6	0.02	0.1	2.1	387	0
2007	3.1	0.02	0.1	2.5	352	0

The major source threshold for triggering Title V permitting requirements in Baltimore County is 25 tons per year of NO_x or VOCs and 100 tons per year for any other criteria pollutant. Since the actual VOC emissions from the facility are greater than the major source threshold, Diageo is required to obtain a Title V-Part 70 Operating Permit under COMAR 26.11.03.01.

The Department received a Part 70 permit renewal application for the facility on December 27, 2011. An administrative completeness review was conducted and the application was deemed to be administratively complete. A

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completeness determination letter was sent to Diageo on February 7, 2012 granting Diageo an application shield.

Diageo's Relay facility is reducing barrel aging operations, which are the major VOC emission units of the facility. At the time of submitting the Title V renewal application, the facility no longer operates its barrel filling operation (Emission Unit 040) or its Cream Liqueur Manufacturing operation (EU 120). The printing inks(EU 090) are no longer used. The facility is keeping a trend of reducing VOC emissions through plant modernization and reducing barrel aging operations.

Since the last issuance of Title V operating permit, the Department has issued to the facility the following Permits to Construct:

1. Installation of one (1) plate and frame filter (ARMA Registration Number 005-0146-9-1373; 2009);
2. Installation of two (2) 5,000-gallon storage / process tanks in the existing blending building (Building #17; ARMA Registration Number 005-0146-8-0307; 2010);
3. Modification of the existing unloading, processing, storage, bottling, and loading operations (ARMA Registration Number 005-0146-8-0307, 8-0308, 8-0309, 8-0333, 8-0334, and 9-1373; 2011);
4. Replacing eight (8) plate and frame filters with ten (10) new SUPRpak filters system (ARMA Registration Number 005-0146-9-1373; 2011);
5. Replacing existing bottling lines with four new bottle filler lines (ARMA Registration Number 005-0146-8-0333; January 2012);
6. Installation of one (1) off-spec finished case goods unloading system (ARMA Registration Number 005-0146-8-0379; July 2012);
7. Modification of the existing filter systems by adding six (6) new SUPRApak filters (ARMA Registration N0. 005-0146- 9-1373; September 2012); and
8. Installation of six (6) new 100K-gallon bulk product storage tanks and the relocation of five (5) 4,500-gallon tanks (ARMA Registration N0. 005-0146- 8-0307; September 2012)

The (1) replacement of existing plate and frame filters with new SUPRApak filters system, which reduce fugitive VOC emissions during filter media maintenance, is still in process at the time of T5 renewal. The replacement of existing eight

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bottling lines with four new bottle filler lines are scheduled to be finished in the fall of the year. The changes to the facility are reflected in this permit renewal.

GREENHOUSE GAS (GHG) EMISSIONS

Diageo's Relay facility emits the following greenhouse gases (GHGs) related to Clean Air Act requirements: carbon dioxide, methane, and nitrous oxide. These GHGs originate from fuel combustion processes (i.e., boilers) contained within the facility premises applicable to Diageo's Relay facility. The facility has not triggered Prevention of Significant Deterioration (PSD) requirements for GHG emissions; therefore, there are no applicable GHG Clean Air Act requirements. Emission certifications reports for the years 2008, 2009, and 2010, show that Diageo's Relay facility is not a major source (threshold: 100,000tpy CO₂e) for GHG's (see Table 2 shown below).

The following table summarizes the actual emissions from Diageo's Relay facility based on its Annual Emission Certification Reports:

Table 2: Greenhouse Gases Emissions Summary

GHG	Conversion factor	2009 tpy CO₂e	2010 tpy CO₂e	2011 tpy CO₂e
Carbon dioxide CO ₂	1	3464	3783	2887
Methane CH ₄	21	1.399	1.481	1.178
Nitrous Oxide N ₂ O	310	20.65	21.86	15.39
Total GHG CO ₂ eq		3486	3806	2904

COMPLIANCE ASSURANCE MONITORING (CAM) REQUIREMENTS

CAM is intended to provide a reasonable assurance of compliance with applicable requirements under the Clean Air Act for large emission units that rely on air pollution control (APC) equipment to achieve compliance. The CAM approach establishes monitoring for the purpose of: (1) documenting continued operation of the control measures within ranges of specified indicators of performance (such as emissions, control device parameters, and process parameters) that are designed to provide a reasonable assurance of compliance with applicable requirements; (2) indicating any excursions from these ranges; and (3) responding to the data so that the cause or causes of the excursions are

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corrected. In order for a unit to be subject to CAM, the unit must be located at a major source, be subject to an emission limitation or standard; use a control device to achieve compliance; have pre-control emissions of at least 100% of the major source amount; and must not otherwise be exempt from CAM. Applicability determinations are made on a pollutant-by-pollutant basis for each emissions unit.

Diageo is not subject to CAM because there are no control devices on any of the emission units.

EMISSION UNIT IDENTIFICATION

Diageo's Relay facility has identified the following emission units as being subject to Title V permitting requirements and having applicable requirements.

Table 3: Emission Unit Identification

Emissions Unit Number	ARMA Registration Number	Emissions Unit Name and Description	Date of Installation
010	005-0146-5-1740	Boiler No. 1 – 25.1 MM BTU/hour Kewanee boiler firing natural gas as the primary fuel with No. 2 fuel oil as back-up Building 52	1986
011	005-0146-5-1739	Boiler No. 2 – 12.6 MM BTU/hour Kewanee boiler firing natural gas as the primary fuel with No. 2 fuel oil as back-up Building 52	1986
020	005-0146-8-0308	Warehouse Aging - Rum and whiskey products are stored in oak barrels for aging in Warehouses D, E, G, H, and N (NOTE: Warehouses D and H have not been used for barrel aging since the mid-1980's and 2000, respectively. Before Warehouses D and H are used for barrel aging, the Permittee must contact the	1937

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Emissions Unit Number	ARMA Registration Number	Emissions Unit Name and Description	Date of Installation
		Department to determine the appropriate permitting process.)	
030	(No Reg. No.)	Empty Barrel Storage - Used empty oak barrels are temporarily stored on the grounds outside of Warehouse G and Building 16.	1937
050	(No Reg. No.)	Barrel Emptying - Barrels are transferred from the aging warehouses to Building J where the aged product is recovered for further processing.	1937
060	005-0146-9-1373	Product Filtering - Product is filtered to remove suspended materials. Existing plate and frame filters to be replaced by 16 portable SUPRpak filters. The portable SUPRpak filters are allowed to move within the premises.	<1970, 2009, 2011, 2012
070	005-0146-8-0333	Bottle Filling - Finished alcohol beverage product is dispensed into containers through existing automated filling lines to be replaced by four new bottle fillers (Building 49).	1960-2006, 2012
080	(No Reg. No.)	Glues/Adhesives - Hot melt glues and water-based adhesives used to assemble cartons and apply labels to bottles (Near filling lines).	1937
100	(No Reg. No.)	Tank Truck and Container Filling - 26,000 gallon railcars, 6000 gallon tank trucks, 350 gallon totes, and 55 gallon drums are used periodically to transfer beverage alcohol product between buildings or to ship processed products to other	<1970

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Emissions Unit Number	ARMA Registration Number	Emissions Unit Name and Description	Date of Installation
		facilities (Building/Tank Farm Locations).	
110	005-0146-8-0307	16 Storage Tanks - Building 11, Bulk/finished Product Processing Room *Nine 15,900 gallon tanks **Three 10,000-10,400 gallon tanks **Two 8,400 gallon tanks **One 4,000 gallon tank **One 1,000 gallon tank * Atmospheric vent ** Conservation vent	<1970 1991 1991 2006 2006
111	005-0146-8-0307	9 Storage Tanks - Warehouse M *Three 11,300 gallon tanks **Three 10,000-10,300 gallon tanks *One 4,300 gallon tank *One 4,300 gallon tank **One 1,000 gallon tank * Atmospheric vent ** Conservation vent	<1970 1991 1991 1991 1991 2006
112	005-0146-8-0307	22 Storage Tanks, 50 Shipping Totes and One Mixing Tank - Building D, Spring Garden Flavor Facility **One 7,500 gallon tank **Three 4,300-4,500 gallon tanks **Two 4,100-4,200 gallon tanks **One 3,500 gallon tank **One 2,100 gallon tanks **One 1,500 gallon tank **One 1,000 gallon tank * One 1,000 gallon tank * Six portable tanks <600 gallons * 50 portable 350-gallon	1992 1992 1995 1995 1992 1992 1992 1992 1992

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Emissions Unit Number	ARMA Registration Number	Emissions Unit Name and Description	Date of Installation
		shipping totes * 450 gallon mix tank * Atmospheric vent ** Conservation vent	2000
113	005-0146-8-0307	23 Storage Tanks - Outdoor Tank Farm One 100,000 gallon tank One 45,000 gallon tank Two 33,000 gallon tanks Three 40,000 gallon tanks Four 10,000 gallon tanks Two 100,000 gallon tanks Six 100,000 gallon tanks All tanks have conservation vents	2001 2001 2001 1991 1991 2006 2012
	005-0146-8-0334	Four 100,000 gallon beverage alcohol storage tanks each equipped with a conservation vent	2007
114	005-0146-8-0307	33 Storage Tanks – Building 50, Bottling Tank Building Six 15,100 gallon tanks Twenty 11,500 gallon tanks One 11,500 gallon tank One 1,100 gallon tank Five 1,000 gallon tanks All tanks have conservation vents	1990 1990 1995 1990 1992,2012
115	005-0146-8-0307	24 Storage Tanks – Building 17, Blending Building Four 11,200 gallon tanks Ten 11,200 gallon tanks One 1,900 gallon tank One 575 gallon tank One 1,000 gallon tank Two 3,300-3,600 gallon tanks One 520 gallon tank Three 450 gallon surge tanks	Tanks installed before 1970 2012 2006

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Emissions Unit Number	ARMA Registration Number	Emissions Unit Name and Description	Date of Installation
		One 450 gallon surge tank The four 11,200 gallon tanks have conservation vents. All other tanks have atmospheric vents. The storage tanks are allowed to move within the premises.	2012
116	005-0146-8-0307	37 Storage Tanks – Building 48, Special Products Two 11,700 gallon tanks Four 10,800 – 10,900 gallon tanks Three 7,700-8,200 gallon tanks Thirteen 5,000- 5,600 gallon tanks One 4,200 gallon tank One 1,700 gallon tank Seven 1,100 – 1,200 gallon tanks Six <1,000 gallon tanks All tanks 1,000 gallons and greater have conservation vents	1976 1976 1999 1976 1976 1995 1976 1976
117	005-0146-8-0307	3 Storage Tanks – Building B Three 10,800 – 10,900 gallon tanks (All with atmospheric vents)	<1970
118	005-0146-8-0307	4 Storage Tanks – Building J, Bulk Regauge Two 16,500 – 16,600 gallon tanks Two 230 gallon tanks All tanks with atmospheric vents	All tanks installed before 1970
119	005-0146-8-0307	1 Storage Tank – Spirits Tank Farm, Spirits Storage Tank No. 6 One 500,000 gallon tank equipped with two conservation	<1970

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Emissions Unit Number	ARMA Registration Number	Emissions Unit Name and Description	Date of Installation
		vents	
120	005-0146-8-0379	One off-spec finished case goods unloading system	2012

AN OVERVIEW OF THE PART 70 PERMIT

The Fact Sheet is an informational document. If there are any discrepancies between the Fact Sheet and the Part 70 permit, the Part 70 permit is the enforceable document.

Section I of the Part 70 Permit contains a brief description of the facility and an inventory list of the emissions units for which applicable requirements are identified in Section IV of the permit.

Section II of the Part 70 Permit contains the general requirements that relate to administrative permit actions. This section includes the procedures for renewing, amending, reopening, and transferring permits, the relationship to permits to construct and approvals, and the general duty to provide information and to comply with all applicable requirements.

Section III of the Part 70 Permit contains the general requirements for testing, record keeping and reporting; and requirements that affect the facility as a whole, such as open burning, air pollution episodes, particulate matter from construction and demolition activities, asbestos provisions, ozone depleting substance provisions, general conformity, and acid rain permit. This section includes the requirement to report excess emissions and deviations, to submit an annual emissions certification report and an annual compliance certification report, and results of sampling and testing.

Section IV of the Part 70 Permit identifies the emissions standards, emissions limitations, operational limitations, and work practices applicable to each emissions unit located at the facility. For each standard, limitation, and work practice, the permit identifies the basis upon which the Permittee will demonstrate compliance. The basis will include testing, monitoring, record keeping, and reporting requirements. The demonstration may include one or more of these methods.

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Section V of the Part 70 Permit contains a list of insignificant activities. These activities emit very small quantities of regulated air pollutants and do not require a permit to construct or registration with the Department. For insignificant activities that are subject to a requirement under the Clean Air Act, the requirement is listed under the activity.

Section VI of the Part 70 Permit contains State-only enforceable requirements. Section VI identifies requirements that are not based on the Clean Air Act, but solely on Maryland air pollution regulations. These requirements generally relate to the prevention of nuisances and implementation of Maryland's Air Toxics Program.

**REGULATORY REVIEW/TECHNICAL REVIEW/COMPLIANCE
METHODOLOGY**

Emission Units 010 and 011 – Two (2) Kewanee Boilers rated at 12. 6 and 25.1 million Btu per hour firing natural gas with No. 2 fuel oil as back-up fuel

Both boilers are located in Building 52 and are used for space heat. The boilers were installed in 1986 and are not subject to the NSPS requirements of 40 CFR 60, Subpart Dc that apply to boilers of 10 million Btu per hour or greater installed after June 9, 1989. The boilers burn natural gas as the primary fuel and No. 2 fuel oil as a back-up fuel only during periods of gas curtailment, gas supply emergencies, or periodic testing. Boilers that burn fuel oil as back-up in this manner are not subject to the NESHAP requirements of 40 CFR 63, Subpart JJJJJJ for fuel oil fired boilers.

Applicable Standards/Limits

A. Visible Emissions Limitations

COMAR 26.11.09.05A(2) which states, “a person may not cause or permit the discharge of emissions from any fuel burning equipment, other than water in an unconfined form, which is visible to human observers.”

Exceptions: COMAR 26.11.09.05A(2) does not apply to emissions during load changing, soot blowing, startup, or occasional cleaning of control equipment if:

- (1) The visible emissions are not greater than 40 percent opacity; and
- (2) The visible emissions do not occur for more than 6 consecutive minutes in any sixty-minute period. **[COMAR 26.11.09.05A(3)]**

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Compliance Demonstration

To demonstrate compliance with this requirement, the Permittee is required to properly operate and maintain the boilers in accordance with an operations training manual and preventive maintenance plan. When burning No. 2 fuel oil, the Permittee shall perform a visual observation for a 12-minute period at least once every 168 hours that the boiler burns oil, make any necessary adjustments and/or repairs if visible emissions are observed, and maintain records of the operations manual and preventive maintenance plan, maintenance performed, and a log of all visible emissions observations. The Permittee must also report any incidences of excess emissions to the Department.

Rationale for Periodic Monitoring Strategy

Boilers that burn primarily natural gas in this size range are set up to operate in an automatic mode without oversight of an operator and require minimal preventative maintenance to maintain a level of combustion performance that does not cause visible emissions. If visible emissions occur, it would only occur when burning oil and only when the boiler has not been properly maintained and operated. Weekly observations when burning oil and follow-up maintenance when any visible emissions are observed are sufficient to demonstrate compliance.

B. Control of Sulfur Dioxide Emissions

COMAR 26.11.09.07A(2)(b), which states that “a person may not burn, sell, or make available for sale any distillate fuel with sulfur content by weight by excess of 0.3 percent.”

Compliance Demonstration

To comply with the fuel oil sulfur limits, the Permittee shall obtain fuel supplier certifications for each shipment of fuel received. The fuel supplier certification shall include the name of the supplier and a certified statement from the supplier that the oil complies with 0.3% or less by weight sulfur content limitation. The Permittee shall maintain records of the fuel supplier certifications and make them available to the Department upon request.

Rationale for Periodic Monitoring Strategy

Fuel supplier certifications are sufficient to demonstrate compliance with applicable fuel sulfur limits. No additional monitoring is required.

C. Operational Limit

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The Permittee shall burn only natural gas or No. 2 fuel oil only during periods of gas curtailment, gas supply emergencies, or periodic testing on No. 2 fuel oil (not to exceed 48 hours during any calendar year) in the two (2) boilers.

A natural gas curtailment or supply interruption means any period during which the supply of natural gas to the affected facility is halted for reasons beyond the control of the facility. The act of entering into a contractual agreement with a supplier of natural gas established for curtailment purposes does not constitute a reason that is under the control of a facility for the purposes of this definition. An increase in the cost or unit price of natural gas does not constitute a period of natural gas curtailment or interruption.

If the Permittee wishes to burn No. 2 fuel oil in any of the two boilers at any other times other than allowed of this permit, the Permittee shall apply for and receive an approval or permit from the Department to burn alternate fuels and comply with the requirements of 40 CFR 63, Subpart JJJJJJ.

[Authority: COMAR 26.11.02.09A, 40 CFR §63.11237 and §63.11195(e)]

Compliance Demonstration

To demonstrate compliance with the operational limitation, the Permittee shall keep annual records of the hours of operation that the boilers burned fuel oil, the amount of fuel oil burned each year, and documentation demonstrating that the fuel oil was burned only as a back up fuel during gas curtailment, gas supply emergency, or periodic testing, as allowed under the operational limitation.

Rationale for Periodic Monitoring Strategy

Documentation that the fuel oil was burned only as a back-up during gas curtailment, gas supply emergency, or periodic testing, as allowed under the operational limitation and annual fuel usage records are sufficient monitoring strategies to demonstrate compliance with the operational limitation.

All Emission Units Except Emission Units 010 and 011

Emission Unit 020 – Warehouse Aging
Emission Unit 030 – Empty Barrel Storage
Emission Unit 050 – Barrel Emptying
Emission Unit 060 – Product Filtering
Emission Unit 070 – Bottle Filling
Emission Unit 080 – Glues/Adhesives
Emission Unit 090 – Printing Inks
Emission Unit 100 – Tank Truck and Container Filling
Emission Units 110 to 119 – Storage
Emission Unit 120 – Off-spec Finished Case Goods Unloading

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Applicable Standards/Limits

A. Control of Volatile Organic Compounds - Distilled Spirits Facilities

COMAR 26.11.19.29C(1)(a) which requires that the Permittee empty barrels using a pump-operated, bayonet type suction device, or comparable effective device that minimizes VOC evaporative losses when emptying barrels. This requirement applies to Emission Unit 050 – Barrel Emptying.

COMAR 26.11.19.29C(1)(b) which requires that the Permittee drain distilled spirits from filter plates that are located between the barrel unloading and storage tanks to either a recycling tank or to an enclosed collection system. This requirement applies to all plate and frame filters associated with Emission Unit 060 – Product Filtering.

COMAR 26.11.19.29C(1)(c) which requires that the Permittee use a gravity and vacuum or pressure filling system or comparable effective system to minimize fugitive emissions from the bottling operations. This requirement applies to Emission Unit 070 – Bottle Filling.

COMAR 26.11.19.29C(2) which requires that the Permittee, during warmer weather, periodically wet (at least weekly) used barrels that are stored in the outdoors awaiting disposal to reduce potential leakage and fugitive emissions. This requirement applies to Emission Unit 030 – Empty Barrel Storage.

COMAR 26.11.19.29D which requires that that Permittee develop, maintain, and implement a good operating practices manual to minimize fugitive VOC emissions from distilled spirits facilities. This requirement applies to all other fugitive emission sources at the premises except Emission Units, 010, 011.

Compliance Demonstration

Emission Unit 050 – Barrel Emptying and Emission Unit 070 – Bottle Filling have been equipped with the required devices to comply with the requirements of COMAR 26.11.19.29C(1)(a) and C(1)(c). No periodic monitoring is required.

To comply with the requirements of COMAR 26.11.19.29C(1)(b) and C(2), the Permittee shall conduct weekly inspections to ensure that the required procedures are met. The Permittee shall keep records of all inspections and report any excess emissions to the Department.

To comply with the requirements of COMAR 26.11.19.29D, the Permittee submitted an initial “Good Operating Practices Manual to Manage Fugitive

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Emissions" (GOP) dated April 26, 2001. The GOP is updated with each new installation or change in operation. The Permittee is required to implement the procedures of the GOP, keep the GOP on-site and submit it to the Department upon request, and report any excess emissions to the Department.

Rationale for Periodic Monitoring Strategy

Weekly inspections to verify proper operating procedures and continuous maintenance of the GOP are satisfactory methods to demonstrate compliance with the requirements. No additional periodic monitoring is required.

B. Control of Volatile Organic Compounds – Leak Detection and Repair Requirements

COMAR 26.11.19.16 which requires the Permittee to control VOC equipment leaks from equipment which has the potential to leak VOC, including process equipment, storage tanks, pumps, compressors, valves, flanges, and other pipeline fittings, pressure relief valves, process drains, and open-ended pipes. This requirement applies to all emission units except Emission Units 010 and 011.

Compliance Demonstration

To comply with COMAR 26.11.19.16, the Permittee shall conduct monthly VOC leak inspections of all equipment and their components that may cause leaks of VOC. The Permittee is also required to tag any leaks discovered and repair the leak within the guidelines specified in COMAR 26.11.19.16. Logs of the leak inspections must be kept and made available to the Department upon request.

Rationale for Periodic Monitoring Strategy:

COMAR 26.11.19.16 outlines specific methods to demonstrate compliance with the regulation. By conducting monthly VOC leak inspections, the Permittee is able to demonstrate that they are minimizing leaks of VOC as required by COMAR 26.11.19.16. No additional periodic monitoring is required.

C. Operational Limitations for Emission Unit 110 – Storage Tanks

The Permittee:

- (1) May not load finished products to trucks from the ECF Building;
- (2) Shall convert Tank CA-1 in Rum processing from finished product storage to non-VOC storage;

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- (3) Shall not operate the basement tanks of Building 17, shall use mechanical agitators only, and shall use Tanks 123 and 125 in Building 17 for water storage only;
- (4) Shall not blend bulk product in Tanks 118 and 120 in Building 17; and
- (5) Between the issue date of above referenced permit-to-construct (July 29, 2011) and completion of the activities authorized in the permit-to-construct, the permittee shall permanently remove barrels of bulk product aging from the barrel warehouses that would result in a decrease in VOC emissions equivalent to any VOC emissions increase resulting from the activities authorized by the permit-to-construct.

[Authority: Permit to Construct Nos. 005-0146-8-0307, 8-0308, 8-0309, 8-0333, 8-0334, and 9-1373 issued on July 29, 2011]

Compliance Demonstration and Rationale for Periodic Monitoring Strategy
Upon completion of the activities authorized by the permit to construct, the Permittee will demonstrate compliance with all operational limitations specified. The Permittee shall report any incidences of excess emissions to the Department. No periodic monitoring is required.

COMPLIANCE SCHEDULE

The Diageo facility is currently in compliance with all applicable air quality regulations.

TITLE IV – ACID RAIN

The Diageo facility is not subject to Title IV requirements.

TITLE VI – OZONE DEPLETING SUBSTANCES

The Diageo facility is not subject to Title VI requirements.

SECTION 112(r) – ACCIDENTAL RELEASE

The Diageo facility is not subject to the requirements of Section 112(r).

PERMIT SHIELD

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Diageo requested that a permit shield be expressly included in the Part 70 permit. The Department will grant a permit shield on a unit-by-unit basis. The shield will cover the applicable Clean Air Act requirements that the Department has listed for each unit in this permit.

INSIGNIFICANT ACTIVITIES

This section provides a list of insignificant emissions units that were reported in the Title V permit application. The applicable Clean Air Act requirements, if any, are listed below the insignificant activity.

- (1) No. 2 Stationary internal combustion engines (diesel fire pumps) with an output less than 500 brake horsepower (373 kilowatts) and which are not used to generate electricity for sale or for peak or load shaving;

The diesel pump engines are subject to the following requirements:

- (A) COMAR 26.11.09.05E(2), Emissions During Idle Mode: The Permittee may not cause or permit the discharge of emissions from any engine, operating at idle, greater than 10 percent opacity.
- (B) COMAR 26.11.09.05E(3), Emissions During Operating Mode: The Permittee may not cause or permit the discharge of emissions from any engine, operating at other than idle conditions, greater than 40 percent opacity.
- (C) Exceptions:
 - (i) COMAR 26.11.09.05E(2) does not apply for a period of 2 consecutive minutes after a period of idling of 15 consecutive minutes for the purpose of clearing the exhaust system.
 - (ii) COMAR 26.11.09.05E(2) does not apply to emissions resulting directly from cold engine start-up and warm-up for the following maximum periods:
 - (a) Engines that are idled continuously when not in service: 30 minutes

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(b) all other engines: 15 minutes.

(iii) COMAR 26.11.09.05E(2) & (3) do not apply while maintenance, repair or testing is being performed by qualified mechanics.

(D) COMAR 26.11.36.03A(1), which establishes that the Permittee may not operate an emergency generator except for emergencies, testing and maintenance purposes.

(E) COMAR 26.11.36.03A(5), which establishes that the Permittee may not operate an emergency generator for testing and engine maintenance purposes between 12:01 a.m. and 2:00 p.m. on any day on which the Department forecasts that the air quality will be a code orange, code red, or code purple unless the engine fails a test and engine maintenance and a re-test are necessary.

(F) By May 3, 2013, the Permittee shall comply with the requirement of 40CFR63 Subpart ZZZZ for the Reciprocating Internal Combustion Engines (RICE).

(2) ✓ Space heaters utilizing direct heat transfer and used solely for comfort heat;

(3) ✓ Water cooling towers and water cooling ponds unless used for evaporative cooling of water from barometric jets or barometric condensers, or used in conjunction with an installation requiring a permit to operate;

(4) No. 1000 Unheated VOC dispensing containers or unheated VOC rinsing containers of 60 gallons (227 liters) capacity or less;

The degreasers are subject to COMAR 26.11.19.09D, which requires that the Permittee control emissions of volatile organic compounds (VOC) from cold degreasing operations by meeting the following requirements:

(a) COMAR 26.11.19.09D(2)(b), which establishes that the Permittee shall not use any VOC degreasing material that exceeds a vapor pressure of 1 mm Hg at 20 ° C;

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- (b) COMAR 26.11.19.09D(3)(a—d), which requires that the Permittee implement good operating practices designed to minimize spills and evaporation of VOC degreasing material. These practices, which shall be established in writing and displayed such that they are clearly visible to operators, shall include covers (including water covers), lids, or other methods of minimizing evaporative losses, and reducing the time and frequency during which parts are cleaned;
- (c) COMAR 26.11.19.09D(4), which prohibits the use of any halogenated VOC for cold degreasing.

The Permittee shall maintain on site for at least five (5) years, and shall make available to the Department upon request, the following records of operating data:

- (a) Monthly records of the total VOC degreasing materials used; and
 - (b) Written descriptions of good operating practices designed to minimize spills and evaporation of VOC degreasing materials.
-
- (5) ✓ Equipment for drilling, carving, cutting, routing, turning, sawing, planing, spindle sanding, or disc sanding of wood or wood products;
 - (6) ✓ Brazing, soldering, or welding equipment, and cutting torches related to manufacturing and construction activities that emit HAP metals and not directly related to plant maintenance, upkeep and repair or maintenance shop activities;
 - (7) ✓ Containers, reservoirs, or tanks used exclusively for electrolytic plating work, or electrolytic polishing, or electrolytic stripping of brass, bronze, cadmium, copper, iron, lead, nickel, tin, zinc, and precious metals;
 - (8) Containers, reservoirs, or tanks used exclusively for:

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- (a) ✓ Storage of butane, propane, or liquefied petroleum, or natural gas;
- (b) No. 30 Storage of lubricating oils;
- (c) No. 4 Unheated storage of VOC with an initial boiling point of 300 °F (149 °C) or greater- Two propylene Glycol storage areas in D Warehouse and Bldg 17; Two degreasers.
- (d) No. 4 Storage of Numbers 1, 2, 4, 5, and 6 fuel oil and aviation jet engine fuel- Two no. 2 oil tanks and two diesel fuel tanks.
- (e) No. 1 Storage of motor vehicle gasoline and having individual tank capacities of 2,000 gallons (7.6 cubic meters) or less;
- (f) No. 2 The storage of VOC normally used as solvents, diluents, thinners, inks, colorants, paints, lacquers, enamels, varnishes, liquid resins, or other surface coatings and having individual capacities of 2,000 gallons (7.6 cubic meters) or less- Number refers to storage location (D warehouse and ECF maintenance);
- (9) ✓ First aid and emergency medical care provided at the facility, including related activities such as sterilization and medicine preparation used in support of a manufacturing or production process;
- (10) ✓ Potable water treatment equipment, not including air stripping equipment;
- (11) ✓ Comfort air conditioning subject to requirements of Title VI of the Clean Air Act;
- (12) ✓ Natural draft hoods or natural draft ventilators that exhaust air pollutants into the ambient air from manufacturing/industrial or commercial processes;
- (13) ✓ Laboratory fume hoods and vents;

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For the following, attach additional pages as necessary:

- (14) any other emissions unit at the facility which is not subject to an applicable requirement of the Clean Air Act (list and describe):

No. 2 Ammonia Cooling Systems (Building 48 and Warehouse M)

No. 1 10,000 gallon neutralization tank for demineralization system

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STATE ONLY ENFORCEABLE REQUIREMENTS

The Diageo facility is subject to the following State-only enforceable requirements:

1. Applicable Regulations:

- (A) COMAR 26.11.06.08 and 26.11.06.09, which generally prohibit the discharge of emissions beyond the property line in such a manner that a nuisance or air pollution is created.
- (B) COMAR 26.11.15.05, which requires that the Permittee implement "Best Available Control Technology for Toxics" (T – BACT) to control emissions of toxic air pollutants.
- (C) COMAR 26.11.15.06, which prohibits the discharge of toxic air pollutants to the extent that such emissions will unreasonably endanger human health

2. Record Keeping and Reporting:

The Permittee shall submit to the Department, by April 1 of each year during the term of this permit, a written certification of the results of an analysis of emissions of toxic air pollutants from the Permittee's facility during the previous calendar year. The analysis shall include either:

- (a) a statement that previously submitted compliance demonstrations for emissions of toxic air pollutants remain valid; or
- (b) a revised compliance demonstration, developed in accordance with requirements included under COMAR 26.11.15 & 16, that accounts for changes in operations, analytical methods, emissions determinations, or other factors that have invalidated previous demonstrations.